

Message

From: Jeffrey H Birk [jeffrey.birk@basf.com]
Sent: 9/23/2020 6:03:28 PM
To: Hathaway, Margaret [Hathaway.Margaret@epa.gov]
CC: Kenny, Daniel [Kenny.Dan@epa.gov]; John Sedivy [john.sedivy@basf.com]; John Erickson [john.r.erickson@basf.com]
Subject: BASF analysis of state reported off-target complaints
Attachments: 2017_2020_State_Reported_Off-Target_Summary_EPA.xlsx; DT Use Complaints to States 2017-2020Graph (003).pdf

Flag: Follow up

Hello Meg,

Last week on one of the BASF calls with EFED, BASF discussed the overall reduction in the number of off target complaints to states from 2017 through 2020. Attached are two slides that track the number of complaints to the states from 2017 through 2020, as a total and expressed on the basis of per 100,000 acres of planted DT crops (cotton and soybean). The background information on how the analysis was performed is included with the spreadsheet.

Although there may be differing opinions about the total number of complaints or off target incidents, the overall trend has been a decline in the number of complaints, particularly in the south where dicamba usage in DT crops has been the most intense.

BASF believes that the data demonstrates that the label is not too complex to be followed and that reduced complaints should reduce any social tensions or anticompetitive effects.

Please let me know if there are any questions.

Thanks,

Jeff

JEFFREY BIRK
Product Registration Manager

Phone: +1 919 547-2622, Mobile: +1-919-225-9220, Fax: +1 919 547-2850, Email: jeffrey.birk@basf.com
Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States



BASF Corporation